

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): September 14, 2020
2. Deadline for first request for production of documents request for interrogatories: Sept. 28, 2020
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) none; defendant(s) none
3. Date for completion of any joinder of additional parties and amendment of the pleadings: Nov. 13, 2020
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) ; defendant(s)
4. Number of depositions by plaintiff(s) of: Parties 1; non-parties: 1
5. Number of depositions by defendant(s) of: Parties: 1; non-parties 1
6. Date of status conference (joint status report due two business days in advance): December 10, 2020
7. Date for completion of factual discovery: January 29, 2021
8. Are expert witnesses needed? Yes No
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical 1; non-medical
- 8(b). Date for completion of those expert reports: February 22, 2021
- 8(c). Number of expert witnesses, if any, of defendant(s): medical 1; non-medical
- 8(d). Date for completion of those expert reports: March 22, 2021
9. Date for completion of expert discovery: April 23, 2021
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance):
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions:

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions:

Motion to Dismiss

February 22, 2021

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.)

Yes____No x____

14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.)

Yes____No x____

15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.)

Yes____No x____